

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| In RE: Neil Charles Heinrich, II, | CASE NO. 23-11578-pmm |
| Debtor. | |
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| Pennsylvania Housing Finance Agency, | Chapter 13 |
| Movant, | |
| v. | |
| Neil Charles Heinrich, II, | |
| Respondent, | |
| William C. Miller, | |
| Trustee. | |

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Pennsylvania Housing Finance Agency has filed a Motion for Relief with the court to Lift the Automatic Stay to Permit Pennsylvania Housing Finance Agency to Foreclose on debtor's property located at 530 E. Howard Street, Pottstown, PA 19464-6505.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **December 6, 2023**, you or your attorney must do all of the following:

(a) file an answer explaining your position at

United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix Sr. Federal Courthouse
900 Market Street
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

**Lois M. Vitti, Esquire
Vitti Law Group, Inc.
663 5th Street
Oakmont, PA 15139
Telephone: (412) 281-1725**

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the **Honorable Patricia M. Mayer on December 13, 2023, at 1:00 PM (Eastern Time) United States Bankruptcy Court Eastern District of Pennsylvania, 900 Market Street, Courtroom #1, Philadelphia, PA 19107.**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: November 15, 2023

/s/ Lois M. Vitti
Lois M. Vitti, Esquire
Attorney for Movant